

Message

From: Wyatt, TJ [Wyatt.Tj@epa.gov]
Sent: 12/10/2019 9:02:25 PM
To: Snyderman, Steven [Snyderman.Steven@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]; Kaul, Monisha [Kaul.Monisha@epa.gov]; McFarley, Heather [McFarley.Heather@epa.gov]; Sells, Dexter [Sells.Dexter@epa.gov]; Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]; Tindall, Kelly [tindall.kelly@epa.gov]; Gelso, Brett [gelso.brett@epa.gov]; Harty, Thomas [harty.thomas@epa.gov]; Smearman, Stephen [Smearman.Stephen@epa.gov]; Lee, Andrew [Lee.Andrew@epa.gov]; Hanson, Charmaine [Hanson.Charmaine@epa.gov]; Coy, Murphey (Richard) [coy.richard@epa.gov]; Johnson, Hope [Johnson.Hope@epa.gov]; Hendrick, Lindsey [hendrick.lindsey@epa.gov]; Jarboe, Stephen [Jarboe.Steve@epa.gov]
CC: Mannix, Marianne [Mannix.Marianne@epa.gov]; Khan, Matthew [khan.matthew@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]
Subject: RE: Imidacloprid PID for team review by COB Monday, December 9th
Attachments: Draft Imidacloprid PID 12.2.19 BEAD.docx

Hi, Steven. Thanks for the opportunity to review and provide comments. Attached are BEAD's compiled comments.

If you have any questions, I suggest you talk with Christian and have him include them in the Holiday Trivia Contest.

By the way, there's a comment in the Usage section about the date on the SLUA. Lindsay says you should now have the latest one, dated December 9, so please make sure to use that reference. Thanks!

From: Snyderman, Steven <Snyderman.Steven@epa.gov>
Sent: Monday, December 02, 2019 5:12 PM
To: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Tyler, Jennifer-R <Tyler.Jennifer-R@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Niesen, Meghann <Niesen.Meghann@epa.gov>; Ruhman, Mohammed <Ruhman.Mohammed@epa.gov>; Yingling, Hannah <Yingling.Hannah@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Wait, Monica <Wait.Monica@epa.gov>; Garber, Kristina <Garber.Kristina@epa.gov>; Wagman, Michael <Wagman.Michael@epa.gov>; Stebbins, Katherine <Stebbins.Katherine@epa.gov>; Peck, Charles <Peck.Charles@epa.gov>; Wyatt, TJ <Wyatt.Tj@epa.gov>; Kiely, Timothy <Kiely.Timothy@epa.gov>; Kaul, Monisha <Kaul.Monisha@epa.gov>; McFarley, Heather <McFarley.Heather@epa.gov>; Sells, Dexter <Sells.Dexter@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>; Gelso, Brett <gelso.brett@epa.gov>; Harty, Thomas <harty.thomas@epa.gov>; Smearman, Stephen <Smearman.Stephen@epa.gov>; Lee, Andrew <Lee.Andrew@epa.gov>; Hanson, Charmaine <Hanson.Charmaine@epa.gov>; Laws, Meredith <Laws.Meredith@epa.gov>; Eagle, Venus <Eagle.Venus@epa.gov>; Colby, Deanna <colby.deanna@epa.gov>; Benbow, Gene <Benbow.Gene@epa.gov>
Cc: Mannix, Marianne <Mannix.Marianne@epa.gov>; Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>
Subject: Imidacloprid PID for team review by COB Monday, December 9th

Good afternoon,

Below is a SharePoint [link](#) to the eagerly awaited draft imidacloprid Proposed Interim Decision (PID) for team review. This PID is likely to get plenty of public scrutiny so each division's assistance in providing substantive comments is incredibly important. I apologize for the short turn-around but due to time constraints on when we hope to get this across the river everything has had to be expedited. PRD will need any comments by **COB Monday, December 9th** in SharePoint.

For each division, please look through the entire PID but take particular note of these specific sections:

BEAD:

- Please focus on the accuracy of the use and usage section (pgs. 8 – 9).
 - o We just received the recent SLUAs last week and had a lot of questions regarding some of the apparent dramatic changes in uses since the last SLUA, if you could confirm the information in the PID is accurate that would be key.
- Please confirm the benefits assessments are summarized accurately (pgs. 26 – 31)
- Most importantly, take a look at the mitigation rationale section and confirm the benefits and potential impacts are described accurately (pgs. 33 – 41).

EFED:

- Please focus on the accuracy of the eco risk summary and characterization and incidents sections (pgs. 13 – 25).
- Take a look at the mitigation rationale which references current exceedances.

HED:

- Please focus on the accuracy of the human health risk summary and characterization and incidents sections (pgs. 9 – 13),
- Take a look at the mitigation rationale which references current exceedances (pgs. 33, 41-43).

RD:

- Could you take a look at the document overall, but specifically a focus on the label language we're proposing at the end and any potential issues that might arise from this.

Link to SharePoint page for comment:

https://usepa.sharepoint.com/sites/ocspp_Work/pesticideregistrationreview/Schedules/Neonicotinoids/PIDs/Draft%20imidacloprid%20PID%2012.2.19.docx

Thank you all for your help and patience on this! We really appreciate your input.

Steven Snyderman, Chemical Review Manager
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 Environmental Protection Agency
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